

UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20530

SUPPLEMENTAL STATEMENT

Pursuant to Section 2 of the Foreign Agents
Registration Act of 1938, as Amended

11 JUL 1982

For Six Month Period Ending _____
(Insert date)

Name of Registrant
Milbank, Tweed, Hadley & McCloy

Registration No.
1839

Business Address of Registrant
1 Chase Manhattan Plaza
New York, New York 10005

I - REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

| | | |
|-----------------------|------------------------------|-----------------------------|
| (1) Residence address | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Citizenship | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

(b) If an organization:

| | | |
|--------------------------|------------------------------|--|
| (1) Name | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (2) Ownership or control | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (3) Branch offices | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

2. Explain fully all changes, if any, indicated in Item 1.

No changes.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection
Ended

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? ☐ Yes ☒ No

If yes, furnish the following information:

| <i>Name</i> | <i>Residence Address</i> | <i>Citizenship</i> | <i>Position</i> | <i>Date Assumed</i> |
|-------------|------------------------------|--------------------|-----------------|-------------------------|
|-------------|------------------------------|--------------------|-----------------|-------------------------|

5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal? Yes ☐ No ☐

If yes, identify each such person and describe his services.

Not applicable

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

| <i>Name</i> | <i>Position or connection</i> | <i>Date terminated</i> |
|-----------------|-------------------------------------|------------------------|
| Lana R. Borsook | Attorney associated with registrant | January 29, 1982 |
| Clark T. Randt | Attorney associated with registrant | June 18, 1982 |
| John E. Rogers | Attorney associated with registrant | July 2, 1982 |

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity?

Yes ☐ No ☒

If yes, furnish the following information:

| <i>Name</i> | <i>Residence Address</i> | <i>Position or connection</i> | <i>Date connection began</i> |
|-------------|------------------------------|-----------------------------------|----------------------------------|
|-------------|------------------------------|-----------------------------------|----------------------------------|

II - FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this 6 month reporting period?
Yes ☒ No ☐

If yes, furnish the following information:

Name of foreign principal
Government of the Republic of Zaire

Date of Termination *
February, 1982

* No services rendered during the reporting period and registrant has no formal agreement or understanding with respect to future services.

9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish following information:

Name and address of foreign principal

Date acquired

10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

Banca Nazionale del Lavoro

Banco do Brasil, S.A.

Banco do Estado de Sao Paulo, S.A.

Export Development Corporation

Government of Mexico

The British Petroleum Company, Ltd.

III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

Banca Nazionale del Lavoro - The registrant performed general legal services in connection with the operations of the New York branch of the principal, including preparation of documentation in connection with financing transactions and rendering advice with respect to various legal questions arising during the normal course of branch business; including questions relating to loans, handling accounts relating to decedents' estates, and the effect of the United States laws on various matters and litigation involving New York branch; advice as to permissible activities of the Italian Economic Corporation.

Banco do Brasil, S.A. - The registrant performed general legal services in connection with the commercial banking business of the New York, Grand Cayman and Nassau branches of the principal, including: preparation and negotiation of documentation relating to a number of financing transactions and preparation of model documentation for use in branch lending programs; consultation with branch officers and employees and advice with respect to various legal questions arising during the normal course of branch business; and assistance in connection with litigation and similar matters involving routine branch business.

See Insert Page No. 1

¹ The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?

Yes ☐ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals?

Yes ☐ No ☒

If yes, describe fully.

² The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

| Date | From Whom | Purpose | Amount |
|---|---|-------------------------------|--------------|
| 2/9/82 | Banca Nazionale del Lavoro | legal fees/ reimbursements | \$ 2,776.45 |
| 1/11/82, 2/3/82, 3/26/82, 4/5/82, 4/27/82, 4/19/82, 4/20/82, 4/23/82, 4/29/82, 4/17/82, 5/26/82, 6/4/82, 6/25/82, 6/2/82, 6/9/82, 6/11/82, 6/21/82 | Banco do Brasil, S.A. | legal fees/ reimbursements | \$ 71,150.00 |
| 1/26/82, 4/7/82, 7/27/82 | Government of Mexico | legal fees/ reimbursements | \$130,242.64 |
| 6/24/82 | The British Petroleum Company, Ltd. | legal fees/ reimbursements | \$ 15,750.00 |
| | Government of the Republic of Zaire | None | |
| | Banco do Estado de Sao Paulo, S.A. | None | |
| | Export Development Corporation of Canada | None | |
| | | Total | \$219,919.09 |

14. (b) RECEIPTS - THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

| Name of foreign principal | Date received | Description of thing of value | Purpose |
|------------------------------|------------------|----------------------------------|---------|
|------------------------------|------------------|----------------------------------|---------|

³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

| Date | To Whom | Purpose | Amount |
|------|--|---------|-----------|
| | Miscellaneous office disbursements on behalf of Banca Nazionale del Lavoro | | 463.03 |
| | Miscellaneous office disbursements on behalf of Banco do Brasil, S.A. | | 8,387.00 |
| | Miscellaneous office disbursements on behalf of Banco do Estado de Sao Paulo, S.A. | | 17.88 |
| | Miscellaneous office disbursements on behalf of Export Development Corporation | | 3,111.58 |
| | Miscellaneous office disbursements on behalf of Government of Mexico | | 20,251.45 |
| | Disbursements on behalf of the Government of the Republic of Zaire | | None |
| | Disbursements on behalf of the British Petroleum Company, Ltd. | | None |

Total \$32,230.94

15. (b) DISBURSEMENTS - THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

| <i>Date disposed</i> | <i>Name of person to whom given</i> | <i>On behalf of what foreign principal</i> | <i>Description of thing of value</i> | <i>Purpose</i> |
|--------------------------|---|--|--|----------------|
|--------------------------|---|--|--|----------------|

(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes ☐ No ☒

If yes, furnish the following information:

| <i>Date</i> | <i>Amount or thing of value</i> | <i>Name of political organization</i> | <i>Name of candidate</i> |
|-------------|-------------------------------------|---|------------------------------|
|-------------|-------------------------------------|---|------------------------------|

V - POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

⁵ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda?
Yes ☐ No ☐

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts ☐ Magazine or newspaper ☐ Motion picture films ☐ Letters or telegrams
articles
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other ☐ Lectures or
publications speeches
☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☐ Public Officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (Specify) _____

21. What language was used in this political propaganda:

☐ English ☐ Other (specify) _____

22. Did you file with the Registration Section, Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period?

Yes ☐ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☐ No ☐

24. Did you file with the Registration Section, Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act?

Yes ☐ No ☐

VI - EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes ☐ No ☐ Not Applicable.
Exhibit B⁷ Yes ☐ No ☐

If no, please attach the required exhibit.

- (a) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period?

Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

⁶ The Exhibit A, which is filed on Form OBD-67 (Formerly DJ-306) sets forth the information required to be disclosed concerning each foreign principal.

⁷ The Exhibit B, which is filed on Form OBD-65 (Formerly DJ-304) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6 month reporting period.

Yes ☐ No ☐ Not applicable. Waived.

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements, been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☐ No ☐ No persons listed in Items 5 and 7.

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

See Insert Pages Nos. 2-5

Subscribed and sworn to before me at _____

this _____ day of _____, 19 _____

(Signature of notary or other officer)

⁸ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, Department of Justice, Washington, D.C. 20530.

Insert Page No. 1
to
SUPPLEMENTAL STATEMENT
of
MILBANK, TWEED, HADLEY & McCLOY
For Six Month Period Ending
July 11, 1982

Pursuant to Section 2 of the
Foreign Agents Registration Act
of 1938, as amended

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9 and 10 of this statement?

Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services.

Banco do Estado de Sao Paulo - The registrant performed general legal services in connection with the commercial banking business of the New York agency of the principal, including: preparation and review of documentation relating to financing transactions; and research and advice with respect to various matters involving routine agency business. General advice was also given on establishing offices in other states.

Export Development Corporation - The registrant has advised and represented the principal in connection with an underwritten public offering in the United States of its medium-term notes, and from time to time concerning other questions of United States law, including tax laws, relating to the continuing activities of the principal.

Government of Mexico -- the registrant performed legal services consisting of: advising the principal with respect to the liquidation of collateral located in the United States securing certain railroad bond issues; representing the principal in two civil actions: one brought against it in the U.S. District Court for the District of Nevada under the Foreign Sovereign Immunities Act to recover on debt instruments on which the principal is alleged to be the obligor and a second civil action in the U.S. District Court for the District of Columbia, alleging the illegal taking of property belonging to claimants' ancestors in Texas. Registrant also represented the principal in connection with organization of a Delaware corporation and qualifying said corporation to do business in the State of Texas.

The British Petroleum Company, Ltd. - Rendering of legal advice to the principal in connection with activities of governments of oil-producing countries.

Government of the Republic of Zaire - no services rendered.

to

SUPPLEMENTAL STATEMENT

of

MILBANK, TWEED, HADLEY & McCLOY
For Six Month Period Ending
July 11, 1982

Pursuant to Section 2 of the
Foreign Agents Registration Act
of 1938, as amended

The undersigned swear or affirm that they have read the information set forth in this registration statement and the attached exhibits and that they are familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of their knowledge and belief, except that the undersigned make no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within their personal knowledge.

Anthony D. Schlesinger
Anthony D. Schlesinger

Guilford W. Gaylord
Guilford W. Gaylord

Thomas A. Williams
Thomas A. Williams

John W. Dean
John W. Dean

Andrew J. Connick
Andrew J. Connick

W. Rice Brewster
W. Rice Brewster

Richard S. Brach
Richard S. Brach

Burt J. Abrams
Burt J. Abrams

Joseph R. Siphron
Joseph R. Siphron

L. Edward Shaw, Jr.
L. Edward Shaw, Jr.

Robert S. O'Hara, Jr.
Robert S. O'Hara, Jr.

Kevin R. Hackett
Kevin R. Hackett

Mel M. Immergut
Mel M. Immergut

Richard C. Tufaro
Richard C. Tufaro

Subscribed and sworn to before me at 1 Chase Manhattan Plaza, New York, New York 10005 this 16th day of August, 1982.

Donna M. George

DONNA M. GEORGE
NOTARY PUBLIC, State of New York
No. 30-4694362
Qualified in Suffolk County
Certificate filed in New York County
Commission Expires March 30, 1983

to

SUPPLEMENTAL STATEMENT

of

MILBANK, TWEED, HADLEY & McCLOY
For Six Month Period Ending
July 11, 1982

Pursuant to Section 2 of the
Foreign Agents Registration Act
of 1938, as amended

The undersigned swear or affirm that they have read the information set forth in this registration statement and the attached exhibits and that they are familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of their knowledge and belief, except that the undersigned make no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within their personal knowledge.

Donald B. Brant, Jr.

Douglas W. Jones

Jonathan G. Blattmachr

Edward J. Reilly

Samuel S. Polk

F. William Crandall

Carroll L. Wainwright, Jr.

Richard A. Stark

Alexander D. Forger

Jacob J. Worenklein

John C. Nelson

Peter M. Mortimer

George Forsyth

Thomas P. Dickson

Subscribed and sworn to before me at 1 Chase Manhattan Plaza, New York, New York 10005 this 16th day of August, 1982.

Donna M. George
DONNA M. GEORGE
NOTARY PUBLIC, State of New York
No. 30-4694382
Qualified in Suffolk County
Certificate filed in New York County
Commission Expires March 30, 1982

to

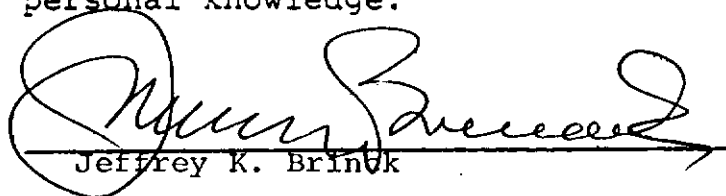
SUPPLEMENTAL STATEMENT

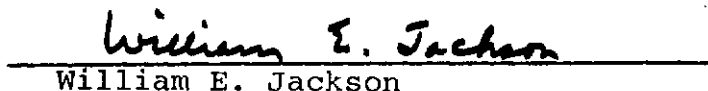
of

MILBANK, TWEED, HADLEY & McCLOY
For Six Month Period Ending
July 11, 1982

Pursuant to Section 2 of the
Foreign Agents Registration Act
of 1938, as amended

The undersigned swear or affirm that they have read the information set forth in this registration statement and the attached exhibits and that they are familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of their knowledge and belief, except that the undersigned make no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within their personal knowledge.

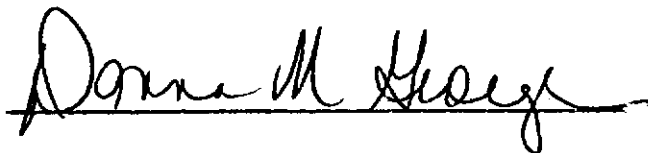

Jeffrey K. Brink


William E. Jackson


Toni C. Lichstein


Jeffrey S. Tallackson

Subscribed and sworn to before me at 1 Chase Manhattan
Plaza, New York, New York 10005 this 16th day of August, 1982.



DONNA M. GEORGE
NOTARY PUBLIC, State of New York
No. 80-4694362
Qualified in Suffolk County
Certificate filed in New York County
Commission Expires March 27, 1983

to

SUPPLEMENTAL STATEMENT

of

MILBANK, TWEED, HADLEY & McCLOY
For Six Month Period Ending
July 11, 1982

Pursuant to Section 2 of the
Foreign Agents Registration Act
of 1938, as amended

The undersigned swear or affirm that they have read the information set forth in this registration statement and the attached exhibits and that they are familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of their knowledge and belief, except that the undersigned make no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within their personal knowledge.

Francis D. Logan

Francis D. Logan

Michael F. Orr

Michael F. Orr

Peter Windley Herman

Peter Windley Herman

Carlo R. Caffuzzi

Carlo R. Caffuzzi

Albert F. Lilley

Albert F. Lilley

Harry E. White, Jr.

Harry E. White, Jr.

Bruce M. Montgomerie

Bruce M. Montgomerie

Subscribed and sworn to before me at 1 Chase Manhattan
Plaza, New York, New York 10005 this 17th day of August, 1982.

Donna M. George

DONNA M. GEORGE
NOTARY PUBLIC, State of New York
No. 30-4694362
Qualified in Suffolk County
Certificate filed in New York County
Commission Expires March 30, 1983

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D. C. 20530

RECEIVED
CRIMINAL DIVISION
AUG 17 2 31 PM '82
INTERNAL SECURITY
SECTION
REGISTRATION UNIT

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes _____ or No X

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes _____ or No X

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

Anthony D. Schlesinger August 17, 1982
Signature Date

Anthony D. Schlesinger
Please type or print name of
signatory on the line above

Partner
Title